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PETA

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March 2, 2005

Stephen Johnson, Acting Administrator
U.S. Environmental Protection Agency
Ariel Rios Bldg. (1101A)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Comments on the HPV test plan for glyphosate intermediate (GI)

Dear Acting Administrator Johnson:

These comments on the Monsanto Co. HPV test plan for GI (CAS no. 5994-61-6), an intermediate compound in the manufacture of glyphosate, are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

Monsanto has carefully assessed the risks to humans and the environment due to GI, and has appropriately concluded that no further animal tests are needed. We would particularly like to note the following comments on page 3 of the test plan:

With considerable similarity between GI and glyphosate in chemical structure, chemical properties and chemical degradation products, the similar conclusion about GI not posing unreasonable risks to human health or the environment can be reached.

This represents a good example of an HPV test plan sponsor using data from related compounds, as requested by the EPA.

Sincerely,

Jessica Sandler
Federal Agency Liaison

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